

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	No. 4:16 CR 303 CEJ/NCC
)	
BRIAN GRIFFIN)	
)	
Defendant.)	

MOTION FOR ADDITIONAL TIME TO FILE PRETRIAL MOTIONS OR WAIVER

COMES NOW defendant BRIAN GRIFFIN, through his attorney, Robert C. Wolfrum, Assistant Federal Public Defender, to move this Court to grant an additional twenty-one days to file pretrial motions or a waiver in this cause.

Counsel additionally moves that any hearing on motions be continued.

As grounds for this request, undersigned counsel states that he has met with Mr. Griffin.

Undersigned counsel has also engaged in discussions with the United States Attorney about a disposition in this case and anticipates being able to file a waiver of pretrial motions in the near future.

Discovery in this case is somewhat voluminous. Counsel needs additional time to review disclosure and to discuss options with Mr. Griffin.

Counsel is acting as expeditiously as possible.

The decision whether to file and litigate pretrial motions can impact points for acceptance of responsibility in the event of a disposition of the case.

Counsel has discussed this request for additional time with the United States Attorney handling the case, who does not oppose this request.

The ends of justice served by time for defendant's counsel to fully and competently prepare and consider options outweigh the interest of the defendant and the public in a speedy and public trial.

By reason of the foregoing, defendant requests an additional twenty-one days to file pretrial motions or a waiver in this cause. Counsel additionally moves that any hearing on motions be continued.

Respectfully submitted,

/s/Robert C. Wolfrum
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Stephen Casey, Assistant United States Attorney.

/s/Robert C. Wolfrum
ROBERT C. WOLFRUM
Assistant Federal Public Defender